

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

03 APR '09 PM 4:09

CLERK, U.S. DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA, FLORIDA

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO.: 8:03-Cr-77-T-30TBM

vs.

SAMEEH HAMMOUDEH,

Defendant.

MOTION TO APPOINT CO-COUNSEL

COMES NOW, the Defendant, SAMEEH HAMMOUDEH, by and through his undersigned counsel, and moves this Honorable Court to appoint an attorney in good standing to assist the undersigned counsel in the trial of the above-styled cause. As grounds for said Motion, the following is alleged:

1. That the pretrial preparation and trial of this case will require an enormous amount of time. The discovery to be provided has been represented by the Government as being overwhelming and extremely time consuming. Moreover, the case will present unique legal issues requiring extensive research.

2. That the trial of the case is expected to last six (6) to twelve (12) months. Preparation will continue during the course of the trial, creating additional scheduling and office management problems.

3. That the appointment of co-counsel would alleviate the

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above-referenced concerns, in that co-counsel could share the workload, including but not limited to meeting with the client who is presently incarcerated at the Coleman Correctional Facility in Coleman, Florida. Said facility is approximately ninety (90) minutes drive from the undersigned's office and their visitation schedule is more restrictive than the local jails where pretrial prisoners are generally housed.

4. That co-defendant Sami Al-Arian has already been appointed two (2) CJA attorneys to represent him in his case.

WHEREFORE, the Defendant prays that his Motion be granted.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished to the OFFICE OF THE UNITED STATES ATTORNEY, 400 Tampa Street, Suite 3200, Tampa, Florida 33602, by hand delivery/U.S. Mail on the 10th day of April, 2003.



DANIEL M. HERNANDEZ, ESQUIRE